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May 28, 2023

VIA EMAIL AND ECF

The Honorable Katherine Polk Failla
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States. v. Esteban Cabrera Da Corte, et al.*, 22-CR-437 (KPF)

Dear Judge Failla:

We represent Mr. Asdrubal Ramirez Mesa in the above-referenced action. With the Government's consent, all defense counsel seek a 45-day adjournment of the briefing schedule, previously set during the February 15, 2023 conference, to permit continued discussions of potential pre-trial dispositions in the above-referenced matter. The proposed alternative deadlines for pre-trial motions would be:

- May 15, 2023 for Defendants' Pretrial Motions;
- June 15, 2023 for the Government's Opposition; and
- June 30, 2023 for Defendants' Reply.

The conference/potential hearing date currently scheduled for May 24 at 11:00am would be adjourned to a date in mid-July or as soon thereafter as would be convenient to the Court.

Thank you for your consideration.

Respectfully submitted,

/s/

Michael W. Martin, Esq.
Lincoln Square Legal Services, Inc.
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Mesa*

cc: Emily Deininger
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